

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Earl Clinkenbeard, PE
Engineering Specialist
Iney Cast Plate
Box 58447
on, CA 90058

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Moses Ferreira

4/7/03

C. Signature

X M.F.

☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from service label)

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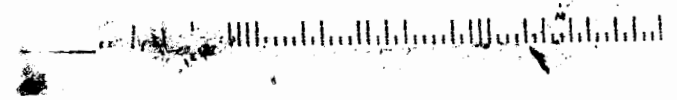


First-Class Mail
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Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Frances Schultz WST-3
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St.
San Francisco,
CA 94105

04





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 3, 2003

Certified Mail No. Z 331 743 027
Return Receipt Requested

In Reply Refer to: WST-3

Mr. Earl Clinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
Post Office Box 58447
Vernon, CA 90058

Re: Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act

Dear Mr. Clinkenbeard:

The purpose of this letter is to direct you or another duly authorized representative of Pechiney Cast Plate to respond in writing to this request for information as a follow-up to the hazardous waste inspection conducted by the United States Environmental Protection Agency ("EPA") at your facility on March 26-27, 2003.

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927(a), EPA may require persons subject to RCRA to furnish information necessary for EPA to administer the Act. Pursuant to EPA's authority set forth in Section 3007(a), you are requested to submit to EPA Region IX the following information for the facility located at 3200 Fruitland Avenue, Vernon, California, EPA ID Numbers CAD 074 126 681 and CAR 000 052 142:

I. A waste determination for the following materials:

- the wood blocks previously used as flooring being stored at the time of the inspection
- "headers" found in cubic-yard cardboard boxes near the "Truck Stop"
- an unlabeled 55-gallon drum located in the area adjacent to the painting area
- a rusty, unlabeled drum located outside of the rear Hazardous Waste Storage Area

The determinations should be made pursuant to the California Code of Regulations, Title 22, Division 4.5, Chapter 12, Section 66262.11, and conclude whether the material is a RCRA or non-RCRA (California-only) hazardous waste or a non-hazardous waste. A detailed narrative explanation of how the determination was made should also be

furnished, including all supporting information and documentation used to make this determination. Supporting information and documentation may include, but is not limited to, laboratory analyses and detailed process information.

II. For each material listed above that you determine is a hazardous waste, please provide the RCRA or non-RCRA (California-only) Waste Code or Codes associated with the waste, the quantity of each hazardous waste in pounds or kilograms, and the best estimated date (with accompanying documentation) of how long these wastes have been stored.

III. Please provide an inventory of all chemicals in the interior Hazardous Materials Storage Area. For each item, please identify the following:

(a) When the material was first stored in the storage area (with documentation). Whether the material is a valuable and usable product or a waste as defined in the CCR Title 22, Division 4.5, Chapter 12, Section 66262.11. For each material that you determine is a valuable and usable product, please provide documentation that supports your determination, including the intended use of this product.

(b) For each material that you determine is a hazardous waste as defined in CCR Title 22, Division 4.5, Chapter 12, Section 66262.11, please provide the results of your hazardous waste determination, and any documentation or laboratory analysis used to make that determination.

(c) For each waste that you determine is hazardous, please provide the RCRA or non-RCRA (California-only) Waste Code or Codes associated with the waste, the quantity of each hazardous waste in pounds or kilograms, and the best estimated date (with accompanying documentation) when this substance became a waste.

IV. Copies of manifests #21663074 (dated 7/7/02) and # 21367718 (also dated 7/7/02) that are signed by the receiving facility.

V. An explanation of why your facility is using two EPA ID numbers: CAD074126681 (for 5401 Alcoa Avenue) and CAR000052142 (for 3200 Fruitland Avenue).

VI. A description of how Pechiney manages oil-contaminated rags and gloves. If the materials are sent to a laundry and re-used, provide information on the laundry service used.

VII. Any documentation of hazardous waste training taken by employees with hazardous waste management duties, including Gene Hurd.

Section 3008 of RCRA, 42 U.S.C. 6928, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part

2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response with this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See, also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a).

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to EPA within twenty-one (21) calendar days from the receipt of this letter. Please address the submittal to:

Robin Holloway
RCRA Enforcement Office, Mailcode: WST-3
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

If you have any questions regarding this matter, please contact Robin Holloway at (415) 972-3305. Your cooperation in this matter is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frances Schultz", with a long horizontal flourish extending to the right.

Frances Schultz, Manager
RCRA Enforcement Office

cc: Charles McLaughlin, Branch Chief
State Regulatory Programs Division, DTSC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Certified Mail No.
Return Receipt Requested

In Reply Refer to: WST-3

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MAIL CODE	WST-3	WST-3	WST-3			
SURNAME	<i>H. Long</i>	<i>C. Lee</i>	<i>M. Smith</i>			
DATE	<i>4-2-03</i>	<i>4/3/02</i>	<i>4/3/03</i>			

U.S. EPA CONCURRENCES

OFFICIAL FILE COPY

- a rusty, unlabeled drum located outside of the rear Hazardous Waste Storage Area

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Frances Schultz, Manager
RCRA Enforcement Office

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